

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

Abiah Israel,

Plaintiff,

vs.

C/A No. 9:25-cv-05981-RMG

Jo Ann Bowditch and Beaufort-Jasper-
Hampton Comprehensive Health Services,
Inc.,

Defendants.

**DEFENDANT BEAUFORT-JASPER-HAMPTON COMPREHENSIVE HEALTH
SERVICES, INC.'s LOCAL RULE 26.01 DISCLOSURES**

Defendant Beaufort-Jasper-Hampton Comprehensive Health Services, Inc ("BJHCHS"), improperly named above as BJHCHS, by and through its undersigned counsel, hereby responds to interrogatories required by Local Civil Rule 26.01 (D.S.C.) as follows:

1. State the full name, address, and telephone number of all persons or legal entities who may have subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: None.

2. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff demands a jury trial in his original complaint.

3. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: BJHCHS is a 501(c)(3) that receives federal funding from the United States.

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

RESPONSE: Plaintiff filed this case in the Court of Common Pleas, Jasper County, South Carolina. BJHCHS removed this case to the United States District Court for the District of South Carolina Beaufort Division, the federal district court embracing Jasper County, on the basis of original jurisdiction under 28 U.S.C. § 1442.

5. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: BJHCHS is not aware of any cases related to this action.

6. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: BJHCHS is properly identified.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe their basis of liability.

RESPONSE: None.

HAYNSWORTH SINKLER BOYD, P.A.

By: s/Joseph D. Dickey, Jr.

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Attorneys for Defendants

June 19, 2025

Columbia, SC